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7 Attorney for Plaintiff, William S. Gonzalez, Sr.  
8 and Jeanette Gonzalez

9  
10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE DISTRICT OF ARIZONA

12 IN RE: BARD IVC FILTERS  
13 PRODUCTS LIABILITY LITIGATION

14  
15 Case No: 2:15-MD-02641-DGC

16 This Document Relates to Plaintiffs:

17 Civil Case No: 2:16-cv-02254-DGC

18 WILLIAM S. GONZALEZ, SR.,  
19 and JEANETTE GONZALEZ

20  
21 UNOPPOSED MOTION FOR  
22 LEAVE TO AMEND COMPLAINT

23 Counsel, pursuant to Rule 25910(1) of the Federal Rules of Civil Procedure,  
24 moves this Court for an order amending the Complaint.

25 1. Plaintiffs seek leave to file the attached Second Amended Master Short Form  
26 Complaint for Damages for Individual Claims and Demand for Jury Trial to correct  
27 Paragraph 10 to read “X G2® X Vena Cava Filter” instead of “X G2® Vena Cava  
28 Filter” (see Second Amended Master Short Form Complaint for Damages for Individual

1 Claims and Demand for Jury Trial).

2 2. Plaintiffs' counsel has conferred with Defendants' counsel and Defendants do  
3 not oppose the filing of this motion.  
4

5 Based on the foregoing, William S. Gonzalez, Sr., and Jeanette Gonzalez  
6 request that this Court grant this request to correct Paragraph 10 to read "X G2® X Vena  
7 Cava Filter," and for leave to file the Second Amended Master Short Form Complaint for  
8 Damages for Individual Claims and Demand for Jury Trial, and direct the Clerk to file the  
9 attached Second Amended Master Short Form Complaint for Damages for Individual  
10 Claims and Demand for Jury Trial.  
11

12 DATED: October 5th, 2017  
13

14 /s/ Joseph R. Johnson  
15 Joseph R. Johnson, Fla Bar #372250  
16 Attorneys for Plaintiffs, William S. Gonzalez, Sr., and  
17 Jeanette Gonzalez  
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20 CERTIFICATE OF SERVICE

21 I hereby certify that on this 5th day of October, 2017, I electronically transmitted  
22 the attached document to the Clerk's Office using the CM/ECF System for filing and  
23 transmittal of a Notice of Electronic Filing.  
24

25  
26 /s/ Joseph R. Johnson  
27 JOSEPH R. JOHNSON  
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